## UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF MICHIGAN

IN RE:

Case No:19-40573 Chapter 13

Hon: RANDON

Kathleen Jobbit

Debtor(s).

CHRISTOPHER E. FRANK (P67169) ecfbk@leducfrank.com, Leduc Frank

Attorney for Creditor P.O. Box 2191 Royal Oak, MI 48068 248-268-2224

Robert W. Bishop 24405 Gratiot Ave Suite 201 Eastpointe, MI 48021 586-775-0600

STIPULATION RESOLVING MOTION TO LIFT THE AUTOMATIC STAY

<u>IT</u> IS HEREBY STIPULATED between the parties herein, that in resolution of the motion for relief from the automatic stay, the stay shall be modified as to Creditor, Cornerstone Community Financial Credit Union, said creditor having validly secured claims in the 2013 Volkswagen CC:

IT IS FURTHER STIPULATED that the Debtor shall file a plan modification within 21 days of the entry of this Order or the stay shall be lifted as to the 2013 Volkswagen CC.

IT IS FURTHER STIPULATED that in the event that debtor(s) fails(s) to maintain plan payments commencing with payments due on or after November 3, 2020, Creditor may submit a notice of Default, served upon debtor and debtor's counsel and permitting 21 days from the service of the notice in which to cure any and all defaults. If debtor(s) fails to cure the default after having been provided with notice under the provisions of this order, then the Creditor may submit an Order of Lift of Stay to the Bankruptcy Court along with an affidavit attesting to a failure to maintain payments, and the stay shall be lifted without a further hearing, or notice.

IT IS FURTHER ORDERED that this Order shall be effective despite any conversion of the case to another chapter of Title 11 of the United States Bankruptcy Code.

Dated: November 3, 2020

/s/ Christopher E. Frank CHRISTOPHER FRANK (P67169) ecfbk@leducfrank.com, Attorney for Creditor P.O. Box 2191 Royal Oak, MI 48068 248-268-2224 chrisf@leducfrank.com

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Attorney for Creditor P.O. Box 2188 Royal Oak, MI 48068 248-268-2224

Andrijana Vujic 24405 Gratiot Ave Suite 201 Eastpointe, MI 48021 586-775-0600

ORDER RESOLVING MOTION TO LIFT THE AUTOMATIC STAY

<u>IT</u> IS HEREBY ORDERED between the parties herein, that in resolution of the motion for relief from the automatic stay, the stay shall be modified as to Creditor, Cornerstone Community Financial Credit Union, said creditor having validly secured claims in the 2013 Volkswagen CC:

IT IS FURTHER ORDERED that the Debtor shall file a plan modification within 21 days of the entry of this Order or the stay shall be lifted as to the 2013 Volkswagen CC.

IT IS FURTHER ORDERED that in the event that debtor(s) fails(s) to maintain plan payments commencing with payments due on or after November 3, 2020, Creditor may submit a notice of Default, served upon debtor and debtor's counsel and permitting 21 days from the service of the notice in which to cure any and all defaults. If debtor(s) fails to cure the default after having been provided with notice under the provisions of this order, then the Creditor may submit an Order of Lift of Stay to the Bankruptcy Court along with an affidavit attesting to a failure to maintain payments, and the stay shall be lifted without a further hearing, or notice.

IT IS FURTHER ORDERED that this Order shall be effective despite any conversion of the case to another chapter of Title 11 of the United States Bankruptcy Code.

Exhibit A